

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com

2 LAILA MASUD, #311731
lmasud@marshackhays.com

3 MARSHACK HAYS LLP
870 Roosevelt

4 Irvine, California 92620
Telephone: (949) 333-7777

5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee
RICHARD A. MARSHACK

7 Christopher B. Ghio (State Bar No. 259094)

8 Christopher Celentino (State Bar No. 131688)

9 Jeremy B. Freedman (State Bar No. 308752)

DINSMORE & SHOHL LLP

10 655 West Broadway, Suite 800
San Diego, CA 92101

11 Telephone: 619.400.0500

Facsimile: 619.400.0501

12 Christopher.ghio@dinsmore.com

13 Christopher.celentino@dinsmore.com

Jeremy.freedman@dinsmore.com

14 Special Counsel to Richard A. Marshack,
15 Chapter 11 Trustee for the Bankruptcy Estate
16 of The Litigation Practice Group P.C.

17 UNITED STATES BANKRUPTCY COURT

18 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

19 In re

20 THE LITIGATION PRACTICE GROUP P.C.,

21 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

CHAPTER 11 TRUSTEE'S FIRST
SUPPLEMENT TO STATUS REPORT

Date: July 19, 2023

Time: 1:30 p.m.

Ctrm: Courtroom 5C – Virtual¹
411 West Fourth Street
Santa Ana, CA 92701

27 ¹ This hearing date is designated Zoom Only, pursuant to Judge Clarkson's self-calendaring
28 procedures. Video and audio connection information for each hearing will be provided on Judge
Clarkson's publicly posted hearing calendar, which may be viewed online at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>.

1 TO THE HONORABLE JUDGE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY
2 COURT JUDGE AND ALL INTERESTED PARTIES:

3 Richard A. Marshack, in his capacity as the Chapter 11 Trustee (“Trustee”) of the bankruptcy
4 estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor”), submits this supplemental case
5 status report (“Status Report”).

6 Trustee filed a Status Report on July 5, 2023, as Dk. No. 172, and wishes to add the
7 following:

8 1. MOTION TO SELL – Trustee anticipates filing a Motion of Trustee Richard A.
9 Marshack For Entry of An Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims,
10 Encumbrances and Interest Pursuant to 11 U.S.C. § 363(b) and (B) Approving Assumption and
11 Assignment of Certain Executory Contracts and Unexpired Leases and Other Agreements (“Motion
12 to Sell”) on July 7, 2023.

13 2. MOTION TO APPROVE MANAGEMENT AGREEMENT – Trustee anticipates
14 filing a Motion to Approve Management Agreement with Resolution Processing on July 7, 2023.

15 3. MOTION TO BORROW – Trustee is also in the process of finalizing and filing a
16 Motion to Borrow Funds to operate for an additional several weeks to allow operations to continue
17 pending determination of the Trustee’s Motion to Sell.

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1 4. SITE VISIT – On July 5, 2023, representatives from the Office of the United States
2 Trustee and counsel for the Official Committee of Unsecured Creditors toured and inspected
3 Trustee’s ongoing operations on Michaelson Drive in Irvine, California. Should the Court desire to
4 conduct a site inspection, Trustee offers to notice the date and time as directed by the Court, so that
5 any other interested party may be present. Attached as Exhibit “1” are photographs taken of the
6 operations center.

7
8 DATED: July 7, 2023

DINSMORE & SHOHL LLP
Special Counsel for Chapter 11 Trustee
RICHARD A. MARSHACK

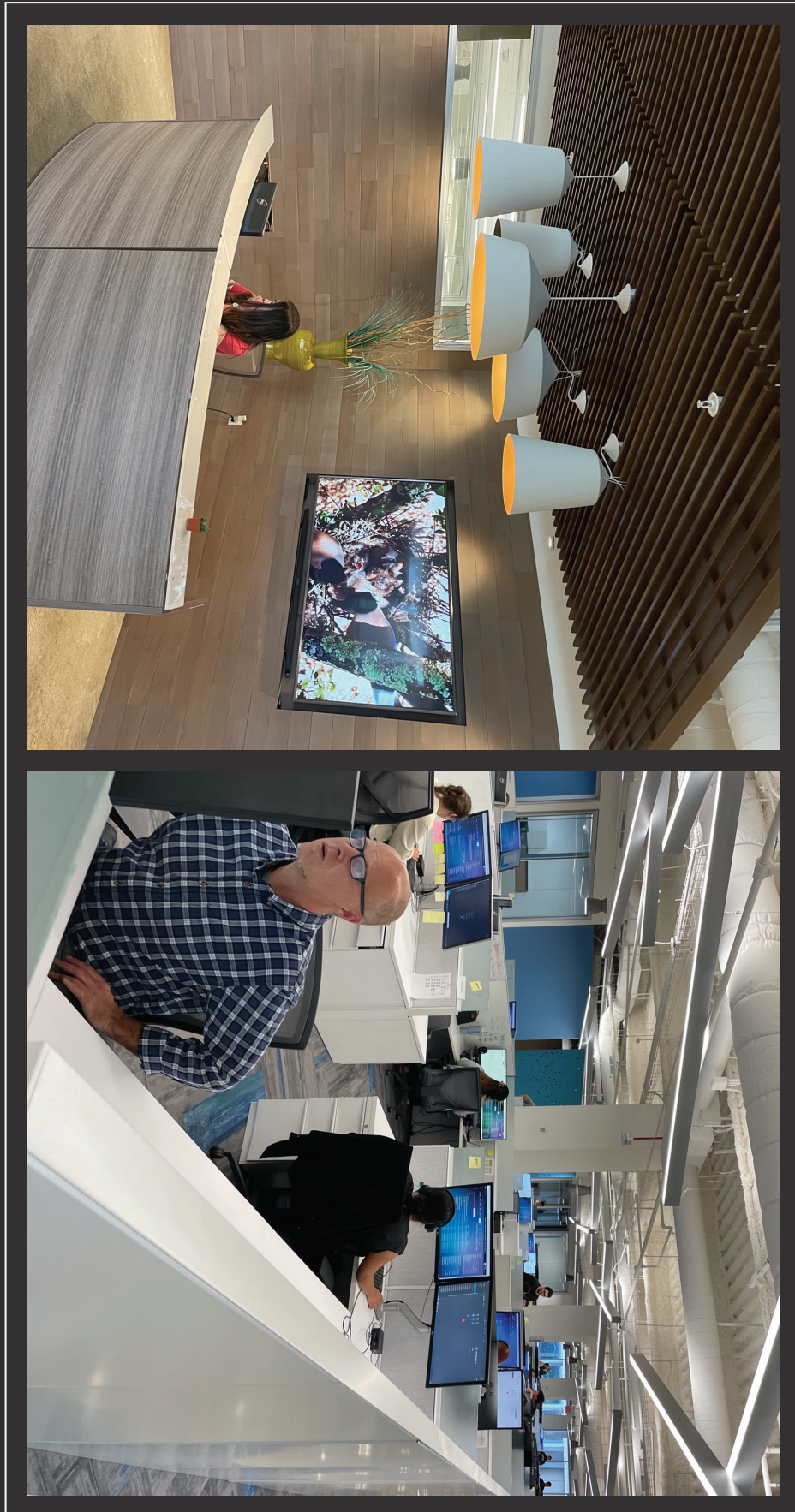
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10 AND

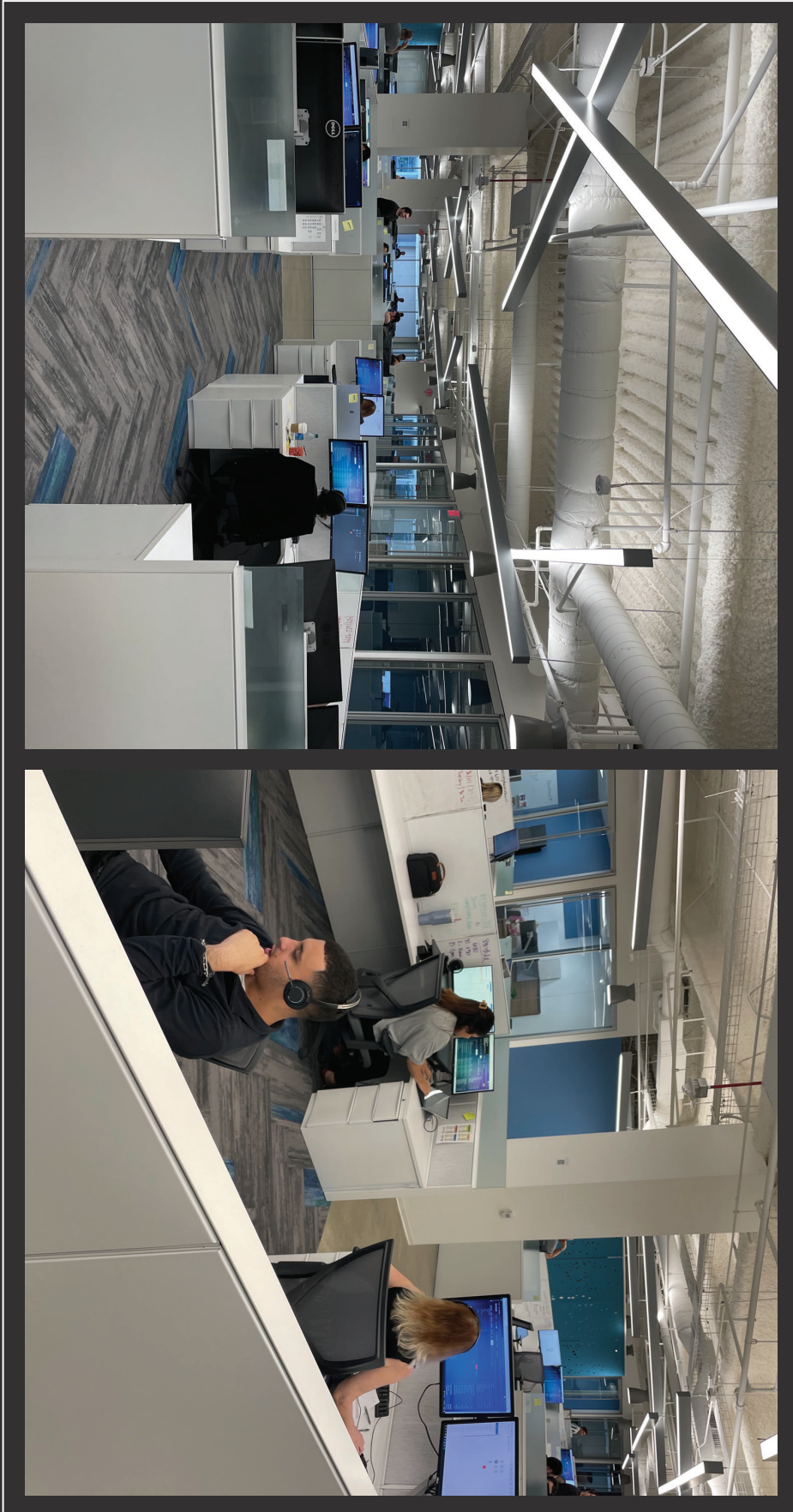
11 MARSHACK HAYS LLP

12
13 By: /s/ D. Edward Hays
14 D. EDWARD HAYS
15 LAILA MASUD
General Counsel for Chapter 11 Trustee
RICHARD A. MARSHACK

16 4894-7915-3007, v. 1
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EXHIBIT 1





PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **CHAPTER 11 TRUSTEE'S FIRST SUPPLEMENT TO STATUS REPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 7, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **July 7, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

THE LITIGATION PRACTICE GROUP P.C.
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR
TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF PROCESS
17542 17TH STREET, SUITE 100
TUSTIN, CA 92780

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 7, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 7, 2023
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** Eric Bensamochan eric@eblawfirm.us, G63723@notify.cincompass.com
- **ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC.:** Ronald K Brown ron@rkbrownlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Christopher Celentino christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- **INTERESTED PARTY COURTESY NEF:** Shawn M Christianson cmcintire@buchalter.com, schristianson@buchalter.com
- **INTERESTED PARTY COURTESY NEF:** Randall Baldwin Clark rbc@randallbclark.com
- **INTERESTED PARTY COURTESY NEF:** Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; clare@lesliecohenlaw.com
- **ATTORNEY FOR CREDITOR CAROLYN BEECH:** Daniel A Edelman dedelman@edcombs.com, courtecl@edcombs.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Christopher Ghio christopher.ghio@dinsmore.com
- **INTERESTED PARTY COURTESY NEF:** Jeffrey I Golden jgolden@go2.law, kadele@ecf.courtdrive.com; cbmeeker@gmail.com; lbracken@wgllp.com; gestrada@wgllp.com; golden.jeffreyi.b117954@notify.bestcase.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC:** Richard H Golubow rgolubow@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR CITY CAPITAL NY:** Alan Craig Hochheiser ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC:** Garrick A Hollander ghollander@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.:** Joon M Khang joon@khanglaw.com
- **ATTORNEY FOR INTERESTED PARTY AD HOC CONSUMER CLAIMANTS COMMITTEE:** Ira David Kharasch ikharasch@pszjlaw.com
- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS:** Nicholas A Koffroth nkoffroth@foxrothschild.com, khoang@foxrothschild.com
- **ATTORNEY FOR DEFENDANT MARICH BEIN, LLC:** David S Kupetz David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
- **INTERESTED PARTY COURTESY NEF:** Christopher J Langley chris@slclawoffice.com, omars@slclawoffice.com; langleycr75251@notify.bestcase.com; ecf123@casedriver.com
- **INTERESTED PARTY COURTESY NEF:** Daniel A Lev daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR PHILLIP A GREENBLATT, PLLC:** Michael D Lieberman mlieberman@lipsonneilson.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com
- **CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR) pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titlexi.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR US TRUSTEE:** Kenneth Miskin Kenneth.M.Miskin@usdoj.gov
- **INTERESTED PARTY COURTESY NEF:** Byron Z Moldo bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com, dperez@ecjlaw.com
- **INTERESTED PARTY COURTESY NEF:** Alan I Nahmias anahmias@mbn.law, jdale@mbnlawyers.com
- **INTERESTED PARTY COURTESY NEF:** Victoria Newmark vnewmark@pszjlaw.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- **ATTORNEY FOR US TRUSTEE:** Queenie K Ng queenie.k.ng@usdoj.gov
- **INTERESTED PARTY COURTESY NEF:** Teri T Pham tpham@enensteinlaw.com, 3135.002@enensteinlaw.com
- **ATTORNEY FOR DEFENDANT GREYSON LAW CENTER PC:** Douglas A Plazak dplazak@rhlaw.com
- **ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, PC:** Ronald N Richards
ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **INTERESTED PARTY COURTESY NEF:** Gregory M Salvato gsalvato@salvatoboufadel.com,
calendar@salvatolawoffices.com; jboufadel@salvatoboufadel.com; gsalvato@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC:** Olivia Scott
olivia.scott3@bclplaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Jonathan Serrano
jonathan.serrano@dinsmore.com
- **ATTORNEY FOR CREDITOR UNITED PARTNERSHIPS, LLC:** Paul R Shankman PShankman@fortislaw.com,
info@fortislaw.com
- **ATTORNEY FOR US TRUSTEE:** Leslie Skorheim leslie.skorheim@usdoj.gov
- **INTERESTED PARTY COURTESY NEF:** Andrew Still astill@swlaw.com, kcollins@swlaw.com
- **US TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC:** Sharon Z.
Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC_KM_ECF_SMO@bclplaw.com
- **INTERESTED PARTY COURTESY NEF:** Johnny White JWhite@wrslawyers.com, jlee@wrslawyers.com;
eweiman@wrslawyers.com

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